

THERESA TAYLOR,

Plaintiff,

v.

DON WAGNER, et al.,
Defendants.

)
)
)
)
)
)
)
)
)
)

Case No. 4:20-cv-00834

Defendant Kansas City, Missouri, Board of Police Commissioners, by and through its members, Don Wagner, Mark Tolbert Cathy Dean, Nathan Garrett and Quinton Lucas, and Plaintiff, Theresa Taylor (“Parties”), respectfully request a protective order pursuant to Fed. R. Civ. P. 26(c), providing that certain records be produced on specified terms and restricting the dissemination of such records. As grounds for this motion, the Parties state:

- 1

3. The Parties agree that production of confidential materials and documents shall be subject to the terms of the proposed Protective Order that is attached to this motion.

4. The Parties stipulate that they are bound by the provisions of the proposed Protective Order that is attached to this motion effective as of the date of filing of this motion.

WHEREFORE, based on the foregoing, the Parties respectfully request the Court to enter the proposed Protective Order that is attached to this motion.

Respectfully Submitted,

ERIC S. SCHMITT
Missouri Attorney General

/s/ Karen A. Read

Karen A. Read
Missouri Bar Number: 47855
Assistant Attorney General
615 East 13th Street, Suite 401
Kansas City, Missouri 64106
Telephone: (573) 301-7415
Facsimile: (816) 889-5006
Email: Karen.Read@ago.mo.gov
Attorney for Defendant

/s/ Gillian R. Wilcox

Gillian R. Wilcox, #61278
ACLU of Missouri Foundation
406 West 34th Street, Suite 420
Kansas City, Missouri 64111
Phone: (816) 470-9933
gwilcox@aclu-mo.org

Anthony E. Rothert, #44827
Jessie Steffan, #64861
Kayla DeLoach, #72424
Molly Carney, #70570
ACLU of Missouri Foundation
906 Olive Street, Suite 1130
St. Louis, Missouri 63101
Phone: (314) 652-3114
Fax: (314) 652-3112
trothert@aclu-mo.org
jsteffan@aclu-mo.org
kdeloach@aclu-mo.org

Amy E. Breihan, #65499
W. Patrick Mobley, #63636
Roderick & Solange MacArthur Justice Center
3115 South Grand Boulevard, Suite 300
St. Louis, MO 63118
Phone: (314) 254-8540
amy.breihan@macarthurjustice.org
pat.mobley@macarthurjustice.org
Attorneys for Plaintiff